

James Bizzieri

From: James Bizzieri
Sent: Thursday, April 9, 2020 2:36 PM
To: Robert M. Burke
Cc: Jessica Piunti; Catherine P. Gorman
Subject: Re: Pryor v. Target

Bob -

Not looking for a list of your (or other attorneys) oral conversations. I am looking for an updated and a rule compliant log as to documents that reflect conversations, notes and investigations (except those with counsel) as stated in the letter. We will file the necessary motion to gain compliance and set it for our next case status.

As I also said in the letter, our discovery responses will be provided in short order. We just received yours this past Tuesday and yesterday. And as you know, the NDIL order has allowed extensions of all deadlines.

Jim

Sent from my iPhone

On Apr 9, 2020, at 1:45 PM, Robert M. Burke <Burker@jbltd.com> wrote:

James,

I disagree. We are not required to advise you of every communication we have with our clients just as you do not need to document in your privilege log every conversation and communication you have with your client as well as every note you personally take in this case. We have complied with the rules by identifying the nature of the communications and the bases for the privileges we have asserted.

We look forward to receiving your long overdue responses to written discovery and your privilege log.

Bob Burke

From: James Bizzieri <jlbizzieri@bizzierilaw.com>
Sent: Thursday, April 9, 2020 1:12 PM
To: Robert M. Burke <Burker@jbltd.com>; Catherine P. Gorman <gormanc@jbltd.com>
Cc: Jessica Piunti <jpiunti@bizzierilaw.com>
Subject: Pryor v. Target

Bob/Katie:

Please see the attached correspondence.

Stay safe and healthy,
Jim

James L. Bizzieri



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